

EXHIBIT A



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
In Re: Methyl Tertiary Butyl Ether ("MTBE")
Products Liability Litigation
----- X

**PLAINTIFF CITY OF NEW
YORK'S COLLECTIVE
RESPONSES AND
OBJECTIONS TO
DEFENDANTS' AUGUST
2008 WELL SPECIFIC
DISCOVERY REQUESTS**

This document relates to the following case:

City of New York v. Amerada Hess Corp., et al., 04 Civ.
3417

MDL No. 1358
Master File C.A. No.
1:00-1898 (SAS)

Plaintiff City of New York ("the City"), by its attorney, Michael A. Cardozo, Corporation Counsel of the City of New York, hereby responds to Defendants' First Set of Requests for Admissions, Interrogatories and Document Requests Concerning Well Nos. 5, 5A, 6, 6A, 6B, 6D 10, 10A, 13, 13A, 21, 22, 23, 26, 26A 27, 31, 32, 33, 36, 39, 39A, 42, 42A, 43, 45, 47, 48, 48A, 49, 50, 50A, 52, 53, 53A, 54, 55, 58 ("Well Specific Discovery Requests"), as follows:

GENERAL STATEMENT

1. By responding to any request, the City does not concede the materiality of the subject to which it refers. The City's responses are made expressly subject to, and without waiving or intending to waive, any questions or objections as to the competency, relevancy, materiality, privilege, or admissibility as evidence, or for any other purpose, of any of the documents or information produced, or of the subject matter thereof, in any proceeding including the trial of this action or any subsequent proceeding.

REQUEST TO ADMIT NO. 19.

To the City's knowledge, water from Well No. 6D was last pumped to customers in 1982.

RESPONSE NO. 19

The City admits that historic pumping records indicate that the original Well No. 6D was last pumped to customers in 1982. The new Well No. 6D has yet to pump to the distribution system.

REQUEST TO ADMIT NO. 20.

The City has never served water from Well No. 6 to customers.

RESPONSE NO. 20

The City admits that it has yet to serve water from either the original or the new Well No. 6.

REQUEST TO ADMIT NO. 21.

The City has never served water from Well No. 6A to customers.

RESPONSE NO. 21

The City admits that it has yet to serve water from either the original or the new Well No. 6A.

REQUEST TO ADMIT NO. 22.

The City has never served water from Well No. 6B to customers.

RESPONSE NO. 22

The City admits that it has yet to serve water from either the original or the new Well No. 6B.

REQUEST TO ADMIT NO. 23.

The City has never served water from Well No. 6D to customers.